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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PROFESSIONAL FINANCIAL INVESTORS,
INC., *et al.*,

Debtors.

Case No. 20-30604

(Jointly Administered)

Chapter 11

**NOTICE OF HEARING ON PFI
TRUSTEE'S OBJECTION TO
SCHEDULED INVESTOR CLAIMS OF
DONALD GUTHRIE AND KAYE
GUTHRIE (UOA Nos. 21160 and 20947)
AND FILED INVESTOR CLAIM OF
DONALD GUTHRIE (Claim No.
HCINV00027)**

Date: April 7, 2022
Time: 10:00 a.m.
Judge: Hon. Hannah L. Blumenstiel
Place: Telephonic/Video Appearances
Only

**TO THE HONORABLE HANNAH L. BLUMENSTIEL AND CLAIMANTS, DONALD
GUTHRIE AND KAYE GUTHRIE:**

On February 10, 2022, the PFI Trust filed the *PFI Trustee's Objection to Scheduled Investor Claims of Donald Guthrie and Kaye Guthrie (UOA Nos. 21160 and 20947) and Filed Investor Claim of Donald Guthrie (Claim No. HCVINV00027)* (the "Objection") with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the "Bankruptcy Court"). [A full copy of the Objection may be obtained at no cost, as provided below.]

By the Objection, the PFI Trust seeks to restate the UOA Claims (defined below) and disallow the Filed Investor Claim (defined below) on the grounds that (a) the scheduled claims of Donald Guthrie and Kaye Guthrie, designated as UOA Nos. 21160 and 20947 (the "UOA Claims"),

1 respectively, by the court-appointed claims agent, did not accurately take into account a division of
2 former joint investments and (b) the filed letter claim dispute of Donald Guthrie, designated as
3 HCINV00027 (the "Filed Investor Claim"), and filed in response to UOA 21160, did not assert a
specific recalculated amount but merely objected to UOA No. 21160 as incorrect.

4 **Any Proof of Claim that the Bankruptcy Court disallows will be treated as if it had not**
5 **been filed and Claimants will not be entitled to any distribution on account thereof.**

6 The Bankruptcy Court will hold a hearing on **April 7, 2022, at 10:00 a.m. (Pacific Time)**
7 (the "Hearing") before the Honorable Hannah Blumenstiel, United States Bankruptcy Judge. **The**
8 **Hearing will be conducted by videoconference.** The courtroom will be closed. All parties who
9 wish to appear at the Hearing should consult the Bankruptcy Court's website at
10 www.canb.uscourts.gov for information about court operations during the COVID-19 pandemic.
The Bankruptcy Court's website provides information regarding how to arrange a telephonic or
video appearance. If you have any questions regarding how to appear at a court hearing, you may
contact the Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the
Bankruptcy Court's website.

11 If you **DO NOT** oppose the disallowance or reduction of the Proofs of Claim identified in the
12 Objection, then you do NOT need to file a written response to the Objection and you do NOT need
to appear at the Hearing.

13 If you **DO** oppose the disallowance or reduction of the Proofs of Claim identified in the
14 Objection, then you **MUST** file a response (a "Response"), in writing, with the Bankruptcy Court,
15 and serve it on the counsel for the PFI Trust at the above-referenced addresses so as to be received
16 by no later than **4:00 p.m. (Pacific Time) on March 24, 2022. The relief requested in the**
Objection may be granted without a hearing if no opposition is timely filed and served in
accordance with the Case Management Order.

17 The Response must, at a minimum, include the following: (i) a caption setting forth the name
18 of the Bankruptcy Court, the name of the Debtor, the case number and title of the Objection to which
19 the Response is directed; (ii) your name, the assigned number(s) of your Proofs of Claim, and an
20 explanation for the amount of the Proofs of Claim; (iii) a concise statement setting forth the reasons
21 why the Bankruptcy Court should not sustain the Objection, including, without limitation, the
22 specific factual and legal bases upon which you will reply in opposing the Objection; (iv) a copy of
23 any other documentation or other evidence of the Proof of Claim, to the extent not already included
24 with the Proof of Claim, upon which you will rely in opposing the Objection at the hearing; (v) a
25 declaration under penalty of perjury of a person with personal knowledge of the relevant facts that
support the Response; (vi) your name, address, telephone number, and/or the name, address, and
telephone number of your attorney and/or designated representative to whom counsel for the Debtors
should serve a reply to the Response, if any; and (vii) the name, address, telephone number, and
email address of the party with authority to reconcile, settle, or otherwise resolve the Objection on
your behalf, if any.

26 If the Bankruptcy Court does not disallow or reduce the Proofs of Claim identified in the
27 Objection, then the PFI Trust will still have the right to object to the Proofs of Claim on other
28 grounds at a later date. Claimants will receive a separate notice of any such objection.

1 Copies of the complete Objection and other pleadings and documents identified herein can be
2 viewed and/or obtained by: (i) free download from on the Debtors' approved notice and claim
3 agent's website at [https:// https://www.donlinrecano.com/pfi](https://https://www.donlinrecano.com/pfi); (ii) accessing the Bankruptcy Court's
4 website at <http://www.canb.uscourts.gov> [PACER account required], or (iii) by mail (for free) by
5 calling Donlin Recano at 1-877-283-0316 (Toll Free) and asking to have a complete copy of the
6 Objection, including all Exhibits mailed to you, or by email at pfiinfo@donlinrecano.com requesting
7 copies of the Objection, including all Exhibits.

8 Dated: February 10, 2022

PACHULSKI STANG ZIEHL & JONES LLP

9 By /s/ John D. Fiero

Debra I. Grassgreen

John D. Fiero

Cia H. Mackle

10 Attorneys for Michael I. Goldberg,
11 Trustee of the PFI Trust